

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CONSUMER FINANCIAL PROTECTION
BUREAU,

Plaintiff,

-against-

NDG FINANCIAL CORP., NORTHWAY
FINANCIAL CORP., NORTHWAY BROKER LTD.,
E-CARE CONTACT CENTERS, LTD., BLIZZARD
INTERACTIVE CORP., NEW WORLD
CONSOLIDATED LENDING CORP., NEW
WORLD LENDERS CORP., PAYROLL LOANS
FIRST LENDERS CORP., NEW WORLD RRSP
LENDERS CORP., PETER ASH, SAGEWOOD
HOLDINGS, LTD., KIMBERLY DETHOMAS,
JEREMY SABOURIN, and WILLIAM WRIXON,

15-cv-5211 (CM)

Defendants,

PETER ASH, SAGEWOOD HOLDINGS, LTD.,
PAUL ASH, KNIGHTSBRIDGE HOLDINGS LTD.,
PAUL GREHAN, 0562752 B.C. LTD., KIMBERLY
DETHOMAS, EMERALD WILLOW HOLDINGS,
LTD., JEREMY SABOURIN, RED RIVER
HOLDINGS COMPANY LTD., WILLIAM
WRIXON, and TWILLINGATE HOLDINGS LTD.,

Relief Defendants.

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NOTICE OF MOTION FOR WITHDRAWAL OF APPEARANCE

PLEASE TAKE NOTICE that Dechert LLP, hereby moves, at the request of Defendants
NDG Financial Corporation, E-Care Contact Centers, Ltd., Blizzard Interactive Corp., New
World Consolidated Lending Corp., New World Lenders Corp., Payroll Loans First Lenders
Corp., New World RRSP Lenders, Kimberly DeThomas, Jeremy Sabourin, and William Wrixon,
and Relief Defendants Emerald Willow Holdings, Ltd., Red River Holdings Company Ltd., and

Twillingate Holdings Ltd. (collectively “the Canadian NDG Defendants”), and for the reasons set forth in the accompanying declaration of Jeffrey Brown, to withdraw its appearance along with the appearances of Jeffrey Brown, Steven Engel, and Sarah Lyons as counsel for the Canadian NDG Defendants in the above-captioned action.

Dated: New York, New York
June 27, 2017

DECHERT LLP

By: /s/ Jeffrey Brown
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Steven A. Engel
Sarah Lyons
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Attorneys for Defendants NDG Financial Corp., E-Care Contact Centers Ltd., Blizzard Interactive Corp., New World Consolidated Lending Corp., New World Lenders Corp., Payroll Loans First Lenders Corp., New World RRSP Lenders Corp., Kimberly DeThomas, Jeremy Sabourin, William Wrixon, Emerald Willow Holdings Ltd., Red River Holdings Company Ltd., and Twillingate Holdings Ltd.

IT IS SO ORDERED.

Dated: June __, 2017

Hon. Colleen McMahon
United States District Judge